Attorneys for Defendant, AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY 8
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10 UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13 SAN FRANCISCO DIVISION
SONY COMPUTER ENTERTAINMENT) Case No.: C 04-0492 AMERICA, INC.,
) STIPULATED REQUEST FOR ORDER Plaintiff, Plaintiff, EXTENDING TIME RE SUMMARY
) JUDGMENT MOTIONS AND EXPERT
) DISCLOSURES; [PROPOSED] ORDER
18 GREAT AMERICAN INSURANCE COMPANY, et al,
Defendants.
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Pursuant to Local Rule 6-2, plaintiff Sony Computer Entertainment America Inc.
23 ("SCEA") and defendant American International Specialty Lines Insurance Company
24 ("AISLIC"), by and between their counsel of record, hereby stipulate as follows:
WHEREAS, AISLIC has filed a Motion for Summary Judgment or, in the Alternative,
Partial Summary Judgment (the "AISLIC Summary Judgment Motion"), and SCEA has filed a
Motion for Partial Summary Judgment against AISLIC (the "SCEA Summary Judgment
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STIPULATED REQUEST FOR ORDER EXTENDING TIME RE SUMMARY JUDGMENT MOTIONS AND EXPERT DISCLOSURES; [PROPOSED] ORDER
CASE NO.: C04-0492

KRIEG KELLER SLOAN REILLEY & ROMAN LLP

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ROMAN LLP

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Motion"), which Motions currently are scheduled for hearing on November 2, 2005;

WHEREAS, the parties have been involved in scheduling and SCEA has recently taken the depositions of various AISLIC witnesses;

WHEREAS the parties have also been working and are continuing to work towards resolving certain remaining discovery issues;

WHEREAS, AISLIC has sought to depose James Bass of SCEA, whose testimony AISLIC may wish to incorporate in its reply brief in connection with the AISLIC Summary Judgment Motion;

WHEREAS, because of scheduling conflicts, the parties anticipate scheduling the deposition of Mr. Bass for the week of October 24, 2005, which is the week following the current deadline for reply briefs in connection with the pending summary judgment motions;

WHEREAS according to the Court's July 12, 2004 Case Management and Pretrial Order the deadline for disclosure of expert witnesses is currently set for October 19, 2005; and

WHEREAS the parties believe that, given the ongoing efforts to resolve the remaining discovery issues, as well as the pendency of the summary judgment briefing, a brief continuance of the deadline for expert witness disclosures is warranted;

THEREFORE, SCEA and AISLIC hereby stipulate to continue the hearing on the AISLIC Summary Judgment Motion and the SCEA Summary Judgment Motion from November 2, 2005 to November 16, 2005, with the parties' respective opposition papers due 21 days before the hearing, and the parties' respective reply papers due 14 days before the hearing; and

THE PARTIES FURTHER STIPULATE to continue the expert disclosure deadline from October 19, 2005 to November 9, 2005.

IT IS SO STIPULATED.

Case 4:04-cv-00492-PJH Document 291 Filed 10/13/05 Page 3 of 4 Dated: October 10, 2005 KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP By: /s/ Michael D. Lisi MICHAEL D. LISI Attorneys for Defendant, AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY

Dated: October 10, 2005 HELLER EHRMAN LLP

By: /s/ Raymond H. Sheen

RAYMOND H. SHEEN

Attorneys for Plaintiff SONY COMPUTER
ENTERTAINMENT AMERICA INC

I hereby attest that I have been authorized by Raymond H. Sheen to execute on his behalf this Stipulated Request for Order Extending Time.

Executed on this 10th day of October, 2005 at San Francisco, California.

/s/ Michael D. Lisi
MICHAEL D. LISI

KRIEG

KELLER SLOAN

ROMAN LLP

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STIPULATED REQUEST FOR ORDER EXTENDING TIME RE SUMMARY JUDGMENT MOTIONS AND EXPERT DISCLOSURES; [PROPOSED] ORDER

CASE NO.: C04-0492

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[PROPOSED] ORDER

Having considered the Stipulated Request for Order Extending Time re Summary Judgment Motions and finding good cause therefor,

IT IS HEREBY ORDERED THAT:

The hearing on (1) defendant American International Specialty Lines Insurance Company's Motion for Summary Judgment or, in the Alternative, Partial Summary Judgment, and (2) plaintiff Sony Computer Entertainment America Inc.'s Motion for Partial Summary Judgment against AISLIC is continued from November 2, 2005 to November 16, 2005. The parties' respective opposition papers must be filed and served 21 days before the hearing, and the parties' respective reply papers must be filed and served 14 days before the hearing;

AND IT IS FURTHER ORDERED that the deadline for expert disclosures shall be continued from October 19, 2005 to November 9, 2005.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

10/13/05 DATED:

THE HONORABLE PHYLLIS J. HAMILTON UNITED STATES DISTRICT JUDGE

NO FURTHER EXTENSIONS WILL BE PERMITTED.